

**In The Matter Of:**

*Jason Jordan, et al.*

*vs.*

*Premier Entertainment Biloxi, et al.*

---

*John Dixson*

*April 2, 2014*

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

JASON JORDAN; ALYSSA JORDAN,  
INDIVIDUALLY AND ON BEHALF OF  
THE ESTATE OF UNBORN BABY JORDAN,  
DECEASED AND ON BEHALF OF ALL OF  
THE HEIRS AT LAW AND WRONGFUL DEATH  
BENEFICIARIES OF UNBORN BABY JORDAN,  
DECEASED; AND CHRISTOPHER SOUKUP PLAINTIFFS

VS. CIVIL ACTION NO. 1:13cv195 LG-JMR

PREMIER ENTERTAINMENT BILOXI, LLC d/b/a  
HARD ROCK HOTEL & CASINO BILOXI; THE  
CITY OF BILOXI, MISSISSIPPI; DOE  
DEFENDANT ONE; JOSHUA HAMILTON, IN HIS  
OFFICIAL AND INDIVIDUAL CAPACITIES;  
DOE DEFENDANT THREE; DOE DEFENDANT  
FOUR; DOE DEFENDANT FIVE AND DOE  
DEFENDANTS 6-10 DEFENDANTS

DEPOSITION OF JOHN DIXSON

Taken at the offices of Page, Mannino,  
Peresich & McDermott, 759 Howard Avenue,  
Biloxi, Mississippi, on Wednesday, April  
2, 2014, beginning at approximately  
12:58 p.m.

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1 T-A-B-L-E O-F C-O-N-T-E-N-T-S  
2

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11 (No exhibits were marked.)

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1 STIPULATION

2 It is hereby stipulated and agreed by and  
3 between the parties hereto, through their  
4 respective attorneys of record, that this  
5 deposition may be taken at the time and place  
6 hereinbefore set forth, by Janna White, C.S.R.,  
7 Court Reporter and Notary Public, pursuant to the  
8 Federal Rules of Civil Procedure, as amended;

9 That the formality of READING AND SIGNING  
10 is specifically NOT WAIVED;

11 That all objections, except as to the form  
12 of the questions and the responsiveness of the  
13 answers, are reserved until such time as this  
14 deposition, or any part thereof, may be used or is  
15 sought to be used in evidence.

16

17 ---  
18  
19  
20  
21  
22  
23  
24  
25

1 JOHN DIXSON,

2 having been duly sworn, was examined and  
3 testified as follows:

## EXAMINATION

5 BY MR. BELLINDER:

6 Q. Good afternoon, sir.

7 A. Good afternoon.

8 Q. My name is Thomas. I am one of the  
9 attorneys for a gentleman named Jason Jordan. His  
10 wife Alyssa Jordan, and another gentleman by the  
11 name of Chris Soukup arising out of an incident  
12 that happened at the Hard Rock back in  
13 November 2011.

14 MR. BELLINDER:

15 For the record, again, this deposition  
16 is being taken pursuant to the Federal Rules of  
17 Civil Procedure.

18 Q. Mr. Dixon, have you ever given a  
19 deposition before?

20           A.     Yes.  Yes, I have.  When I last speak  
21        it was about things going on when I was in the  
22        army.

23 Q. Do you know about when that was?

24                   A.        Oh, yeah. I got out of the army in  
25       '92. So that was '90. Washington, D.C.

1 Q. Okay. Do you remember the  
2 circumstances of that?

3 A. It was just -- it was a deal with a  
4 vehicle that got hit that was driving -- I had  
5 driven the vehicle, and it was just how the  
6 vehicle look when I drove it.

7 Q. I got you. You would have been giving  
8 some testimony about what you saw and things like  
9 that?

10 A. Right.

11 Q. Any other depositions that you gave?

12 A. No.

13 Q. Okay. Well, the reason we ask is  
14 actually I'm going to be asking you a series of  
15 questions about that evening and what you remember  
16 and what you recall.

17 A. Sure.

18 Q. And so naturally you saw -- the court  
19 reporter swore you in prior to us getting started,  
20 and so we like to explain that you're under oath  
21 to tell the truth in the same way that you would  
22 be if there was judge here, but it's a little less  
23 formal. We're sort of in a fact finding or what  
24 we call the discovery phase to see about what we  
25 know.

1 A. Right.

2 Q. I always tell folks if you will please  
3 answer all of the questions to the best of your  
4 knowledge. You cannot be compelled to give  
5 something -- to give a yes or no answer. If you  
6 don't know and I don't know is a perfectly good  
7 answer. But, naturally, you are under oath to  
8 tell the truth.

9 A. Sure.

10 Q. Also, any time I ask you a question  
11 about any specific event, a conversation,  
12 somebody, something that happened, it will always  
13 call for your personal knowledge.

14 A. Right.

15 Q. In the same way you can't be compelled  
16 to say yes or no, you can't be compelled to  
17 testify about something you don't have personal  
18 firsthand knowledge of.

19 A. Right.

20 Q. One other thing that we'll do, she is  
21 taking down everything that we say, and so to make  
22 her job a little easier, casual conversation we  
23 may nod our head, say uh-huh or huh-uh, you and I  
24 know exactly what we're saying, but --

25 A. Right.

1           Q.     -- she's got to take a record that we  
2 may have to look back at later. So if you will  
3 answer audibly, I will try and do the same. And  
4 then, also, if you will allow me to finish my  
5 question, I'll allow you to finish your answer,  
6 that way we don't overlap and make her job next to  
7 impossible.

8               Okay. Great. If you would, just give  
9 me your full -- your full name?

10          A.     Johnnie Dixon, Jr.

11          Q.     John Dixon, Jr.

12          A.     Johnnie Dixon, Jr.

13          Q.     J-O-H-N-N-Y?

14          A.     I-E.

15          Q.     I-E.

16          A.     D-I-X-S-O-N.

17          Q.     I wondered about that. I've seen it  
18 spelled both ways and junior.

19          A.     Right.

20          Q.     Okay. Mr. Dixson, where do you  
21 currently reside?

22          A.     D'Iberville.

23          Q.     What is your current address there in  
24 D'Iberville?

25          A.     4538 Magnolia Cove West, D'Iberville,

1 Mississippi, 39540.

2 Q. How long have you lived there on  
3 Magnolia Cove?

4 A. Seven years.

5 Q. Seven years. Good. Born in  
6 Mississippi?

7 A. Biloxi.

8 Q. Okay. What's your date of birth?

9 A. October 16th, 1965.

10 Q. My birthday is the 13th. October.  
11 Libras. Currently married?

12 A. No.

13 Q. Ever been married?

14 A. Yes.

15 Q. Who was your -- what was your former  
16 spouse's name?

17 A. Joyce Brooks.

18 Q. Brooks is her maiden name?

19 A. Uh-huh.

20 Q. Had you ever been married to anybody  
21 other than Ms. Joyce Brooks?

22 A. No.

23 Q. Do you have any children?

24 A. Yes.

25 Q. Over the age of 18?

1 A. Yes.

2 Q. Okay. Tell me their names.

3 A. Dionna Brooks -- I mean Dionna Dixson.

4 Q. D-E --

5 A. D-I-O-N-N-A.

6 Q. Dionna Dixson?

7 A. Dixson, D-I-X-S-O-N. And then Davina,  
8 D-A-V-I-N-A, Dixson. And Julian Dixson.

9 Q. Dionna, Davina, and Julian all from  
10 Ms. Joyce?

11 A. Yes.

12 Q. And you said they are all over the age  
13 of 18?

14 A. Yes.

15 Q. Do you know -- do any of or all of them  
16 reside in the Southern Mississippi area?

17 A. Yes, both daughters do.

18 Q. Okay. They live in Biloxi or  
19 D'Iberville?

20 A. D'Iberville, and one daughter lives in  
21 Gulfport.

22 Q. Which one lives in Gulfport?

23 A. Davina.

24 Q. And then where does Julian live?

25 A. Atlanta.

1           Q.     Atlanta.  The reason we ask these  
2 questions, and I've said it four times already  
3 today because we've been doing it already, wanting  
4 to get to know you, to get to know a little  
5 background, but also we want to make sure that  
6 nobody -- in the event that we do have to pick a  
7 jury on a case like this -- that nobody knows or  
8 is closely related to any of the lawyers, the  
9 parties, the witnesses, or anybody that's  
10 important.

11           A.     Gotcha.

12           Q.     Do you have any close family -- when I  
13 say close family -- mom and dad, brother, sister,  
14 cousins, aunts, uncles who live in the southern  
15 Mississippi area?

16           A.     Yes, my mom and my sister.

17           Q.     Okay.  What's your mom's name?

18           A.     Elsie Ruth Dixson.

19           Q.     O-S-I-E?

20           A.     E-L-S-I-E.

21           Q.     Elsie.

22           A.     Elsie.  And carol Dixson.

23           Q.     And Carol is your sister?

24           A.     Yes.

25           Q.     They live in --

1 A. Biloxi.

2 Q. Both in Biloxi?

3 A. Uh-huh.

4 Q. Anybody else you can think of?

5 A. No.

6 Q. Good deal. Briefly for us, the  
7 highlights of your educational background.

8 A. High school education. Then went in  
9 the army. Went to medical logistics school,  
10 medical supply, driving school.

11 Q. Where did you go to high school?

12 A. Biloxi.

13 Q. Do you remember what year you enlisted  
14 in the army?

15 A. 1984.

16 Q. '84. You say you did some medical  
17 logistics supply type training?

18 A. I was a medic also.

19 Q. Okay, and then you said driving?

20 A. Yeah. I drove all the vehicles, all  
21 the large vehicles, the forklifts and trucks. I  
22 had to do a driving course for that.

23 Q. Gotcha. Any other education you can  
24 think of?

25 A. No.

1 Q. When were you discharged from the army?

2 A. 19 -- well, active duty 1992. Then I  
3 did six years reserve after that.

4 Q. Discharged from active duty in '92?

5 A. Uh-huh, April of '92.

6 Q. April?

7 A. Uh-huh.

8 MR. STEWART:

9 You've got to say yes.

10 A. Yes, I'm sorry.

11 MR. BELLINDER:

12 Q. You say you did six years in the  
13 reserves?

14 A. Reserves.

15 Q. Honorably discharged from military  
16 duty?

17 A. Yes, honorably discharged.

18 Q. And then you would have been done with  
19 the Reserves about '98?

20 A. '98.

21 Q. Work background, same thing, just kind  
22 of highlight for us.

23 A. I work security at the Hard Rock.

24 Q. Currently?

25 A. Currently. And currently employed at

1 | Chevron Refinery in Pascagoula.

2 Q. How long have you been with the Hard  
3 Rock?

4 A. Six years.

5 Q. And how long have you been with  
6 Chevron?

7                   A.        Right at eight months.

8 Q. What do you do at Chevron?

9 A. Painter blaster.

10 Q. Painter blaster.

11 A. Painter blaster.

12 Q. Prior to your si

13 Rock -- well, let me ask you this: During that  
14 six years, currently you've got another job, a  
15 second job, had you ever had another job during  
16 these past six years at Hard Rock?

17 A. Yes. Yes. I worked construction at  
18 B&M Construction and Aladdin Construction.

19 Q. Basically what it sounds like  
20 construction work?

21           A.     Yeah.   Construction work.   Building  
22    federal buildings, casinos, courthouses,  
23    hospitals.

24 Q. Prior to your six years at the Hard  
25 Rock, where did you work?

1 A. Well, I was there -- I was at IP  
2 Casino.

3 Q. The IP?

4 A. Uh-huh.

5 Q. And that's here in Biloxi?

6 A. Uh-huh.

7 Q. And before I get too far, the -- your  
8 six years have all been here in Biloxi for the  
9 Hard Rock?

10 A. Biloxi, uh-huh.

11 Q. How long did you work with the IP?

12 A. Right at five years security.

13 Q. Security. That was my next question.  
14 Do you remember your job title with them?

15 A. Security officer.

16 Q. Security officer. Prior to the IP,  
17 where did you work?

18 A. I was doing construction then.

19 Q. Construction. Had you ever had any  
20 other security positions prior to the IP?

21 A. No.

22 Q. And then what was your job title when  
23 you came to work for the Hard Rock?

24 A. Security.

25 Q. Has your job title changed at all in

1 your six years?

2 A. No.

3 Q. And so you were employed by the Hard  
4 Rock November 27, 2011, as security guard?

5 A. Yes.

6 Q. And you're paid by them as an employee?  
7 You're not like an independent contractor?

8 A. No.

9 Q. You don't get a separate 1099. You're  
10 an employee.

11 A. Right.

12 Q. Training when you came to work for  
13 either -- let's talk about the Hard Rock. Were  
14 you trained to provide security? Were you trained  
15 in your duties and if so, how?

16 A. Well, we were told how to handle  
17 security. I had been security before, like I  
18 said, at the IP, and I was known by the guys that  
19 employed me at the Hard Rock. They had asked me  
20 to come over to them. They knew me from the IP  
21 Casino. I had worked there six years -- five  
22 years. In security they know me as pleasant and  
23 kind customer service and brought me over.

24 Q. Wasn't any type of formal course or --

25 A. No.

1 Q. -- just sit down and go through formal  
2 training?

3 A. No.

4 Q. It's just, you know, explain to you how  
5 it's done?

6 A. That's it.

7 Q. Okay. Great. Prior to this particular  
8 date, did you know Jason or Alyssa Jordan or this  
9 guy Chris --

10 A. No.

11 Q. -- Soukup?

12 A. No.

13 Q. Have you ever been convicted of a crime  
14 in the last ten years?

15 A. No.

16 MR. STEWART:

17 Felony.

18 MR. BELLINDER:

19 Q. Felony?

20 A. No.

21 Q. Okay. Have you seen the video, the  
22 surveillance footage of this incident subsequent  
23 to it taking place?

24 A. Yes.

25 Q. When was the last time you saw it?

1 A. This weekend.

2 Q. This weekend. When was the first time  
3 you saw it; do you remember?

4 A. Wow. I can't remember the date. It  
5 was a while back.

6 Q. Did you review any documents in getting  
7 ready for your deposition today?

8 A. No.

9 Q. Aside from the lawyer for the casino,  
10 have you talked to anybody about what happened?

11 A. No.

12 Q. Have you talked to John Brown or Amanda  
13 or Mr. Strong or anybody?

14 A. No.

15 Q. Okay. Do you specifically remember  
16 independent -- strike that. Do you have an  
17 independent recollection of this night and these  
18 events? And what I mean by that is --

19 A. Yes, I do.

20 Q. In other words, you remember this stuff  
21 aside from having to look at the video to refresh  
22 you or look at something else, talk to somebody,  
23 you actually remember what happened?

24 A. Yes.

25 Q. Tell us, if you would, what you

1 remember about --

2 A. What I remember, the problem was  
3 brought about because the talk of the police --  
4 someone was filming on their phone. But I  
5 remember the guy -- I remember all the fights in  
6 the casino, you know, and I remember this incident  
7 for sure.

8 Q. Okay. Tell us what you remember about  
9 it.

10 A. I remember the fight. The guy, holding  
11 him down. Because basically what he was saying to  
12 me that he kept repeating over and over, If I had  
13 my bayonet, I'd cut your blah, blah head off.  
14 Over and over and over. And I replied to him in a  
15 joking manner, Well, why would you do that?  
16 Trying to calm him down. Why would you do that?  
17 You know. And he was saying it over and over and  
18 over. Trying to calm him down some and letting  
19 him know he wasn't any type threat. Calm him down  
20 saying, You know, why would you do that? Because  
21 I was army, too, so -- I was military, too, so I,  
22 you know. So I kept saying, Okay. Calm down.  
23 Why would you want to do that? He kept saying it  
24 over and over and over. So that kind of thing was  
25 said.

1           Q.     Okay. Anything else you remember about  
2 that particular night?

3           A.     Just the fight you know. Just a brawl.  
4 Just the way it went down, you know. All of a  
5 sudden they all calm and then boom, explode, you  
6 know.

7           Q.     Do you remember the particular people  
8 involved in the incident?

9           A.     Just the guy and his wife, what he was  
10 doing, you know. Just a crowd of guys, you know.  
11 Military guys. I was military. They were out  
12 there having a good time. I remember the guy  
13 saying, coming to me saying, Hey, Man, my guy is  
14 fighting with his wife. I need to get him out. I  
15 say, Sure. So I opened the door so he could go  
16 out.

17           Then all of a sudden one guy goes to  
18 the guy and says to him, Man, you don't hit a  
19 woman. We don't do that in the military. We  
20 don't do that. And he punched that guy. So then  
21 I break them up and get that guy out. I'm on the  
22 ground holding his arm. His wife comes up, and he  
23 hits her like three times in the face. He swings  
24 around me to hit her in the face.

25           So I pull him out in the -- in the

1       casino, you know. You will see we have a front  
2       entrance. I pull him up there. I hold him down.  
3       And he is bucking and that's when he said, If I  
4       had my bayonet, I'd cut your blah, blah head off.  
5       Blah. Blah. And I'm trying to calm him down and  
6       then she comes over there to talk to him. And you  
7       watch, you see a quick struggle because he calls  
8       her a blah, blah, blah. You F'ing blah, blah,  
9       blah. Get her away.

10           Then some guys comes up and grabs her  
11       and backs her up. I don't know the guy that grabs  
12       her -- I don't know if he was -- I don't know the  
13       whole party. He grabbed her and backed her up,  
14       and I'm just holding him down until Biloxi PD  
15       came. That's when I let him go.

16       Q.       And so that's you that can be seen on  
17       the video --

18       A.       Yes.

19       Q.       -- as far as having him, I call it,  
20       pinned to the ground? You've kinda got your  
21       weight on him.

22       A.       Yes.

23       Q.       Do you remember about how big he was?

24       A.       Yeah, maybe about 155, 160.

25       Q.       Security at Biloxi, y'all aren't

1 trained to make arrests; is that right?

2 A. No. We don't arrest anybody. We hold  
3 them until Biloxi PD comes.

4 Q. Had you ever seen -- I'm sorry. I  
5 didn't mean to cut you off. Had you ever seen a  
6 security guard or a manager or an employee of the  
7 casino arrest somebody before?

8 A. No, never arrest. I've seen them  
9 handcuff to detain them for -- if they're being  
10 real -- they're fighting back a lot. They have to  
11 for safety. But only they have handcuffs. We  
12 don't -- we're not cops, you know. So I have seen  
13 that.

14 Q. And who is they?

15 A. Jason Strong. He is -- when I'm there,  
16 he's -- well, there is two officers. There is a  
17 Willie. I'm not sure what his last name is. He  
18 is there when I get there. Then they change  
19 shifts at 12:00. So mainly when I'm in the club,  
20 I see Jason.

21 Q. Okay. So Jason would be the one who  
22 carries handcuffs?

23 A. Right.

24 Q. Do you know if he is a cop or not --

25 A. No.

1           Q. -- an officer? He's just somebody with  
2 the casino that has --

3           A. He is the one that calls the police.  
4 We can never call the police. He -- the  
5 supervisor has to be one to call the police. Our  
6 main objective is to get them calm and get them  
7 out. You know, we never try to ever hold nobody,  
8 nothing like that. And I always tell guys, you  
9 know, Hey, come on. You don't need this, you  
10 know. The police come. You're gonna go to jail.  
11 You'll spend the weekend in jail. You've got to  
12 see a judge. Just calm down and go, you know.

13           And that's what I did in there. I just  
14 pointed to the -- you see me pointing to the door  
15 to the guy. I say, If you get him out of here,  
16 fine. And I opened the door, and that's when they  
17 start arguing. Usually our thing is to get them  
18 out calmly. We want them to come back. So we  
19 don't want nobody to get in trouble and get 86'd,  
20 something like that, you know, so...

21           Q. Now, were you asked to do any type of  
22 report or give a statement or anything in writing  
23 subsequent to this incident of this night?

24           A. I'm trying to remember. No, I don't  
25 believe I -- no.

1           Q.     Would you have been asked any questions  
2 just informally by somebody with the casino?  
3 Somebody just come to you and say --

4           MR. STEWART:

5                   Other than the attorney after the  
6 lawsuit was filed.

7           MR. BELLINDER:

8                   Yeah, not the attorney, of course.

9           Q.     Any questions I ask you, we're not  
10 entitled to know what you and the attorney for the  
11 casino talked about.

12          A.     No.

13          Q.     Anybody in the higher ups with the  
14 casino come to you and say, --

15          A.     No.

16          Q.     -- John, what happened that night in  
17 the casino?

18          A.     No, not at all.

19          Q.     Anybody from any other agency? Anybody  
20 from the police department, sheriff's department,  
21 bureau of investigation, or anybody with the  
22 military, anybody ever come to you and ask you  
23 what did you see, what happened that night?

24          A.     Yes. Biloxi PD. One of them  
25 investigators did call and ask what did I see, and

1 I told them same thing. I guess they were caught  
2 in this also. Asked what I remembered were their  
3 actions while I was there. One of the  
4 investigators called and asked if I was there.

5 Q. Do you remember the investigator's name  
6 by any chance?

7 A. No.

8 Q. Male or female?

9 A. Male.

10 Q. Do you remember about time frame wise  
11 it was after this incident that that guy called  
12 you?

13 A. I would say a week or two. It was  
14 after, I guess, the film came up on You Tube or  
15 whatever I guess. I never saw the You Tube thing,  
16 but I heard someone with their phone that did film  
17 some of it. But even when they filming, I wasn't  
18 there. I was still upstairs at the club, so I  
19 don't know what went on out there.

20 Q. The guys -- and there were multiple  
21 guys that were involved in that -- in that You  
22 Tube. Did you say you have seen it or you haven't  
23 seen it?

24 A. I haven't seen the You Tube.

25 Q. Okay. Matthew Martin, you haven't

1 heard that name before?

2 A. No.

3 Q. Did they -- tell me about the  
4 conversation you had with the investigator. What  
5 all --

6 A. He asked me what had happened. Did I  
7 think the police officers were appropriate in how  
8 they acted. I just saw the guys as they came up  
9 the stairs. And I knew the guy and what he was  
10 saying to me, he was saying as soon as the  
11 guy -- the officer who tapped me on the shoulder  
12 said, John, I got him. They all know me. They  
13 said, John, I got him. So I backed away because  
14 they got him.

15 And the first thing the guy was saying,  
16 I would kill you all. If I had my bayonet, I'd  
17 cut your blah, blah head off. He -- I don't know  
18 where that came from. Just over and over he kept  
19 saying that. And they told him to calm down, and  
20 he wouldn't. And he starting kick, and they had  
21 to take him downstairs.

22 Q. After you were tapped on the shoulder  
23 by the officer, did you have any other involvement  
24 in the situation at all?

25 A. No. All I did was back up the crowd.

1 Moved the crowd to give them more room to get him  
2 downstairs.

3 Q. Did you talk -- and I may have asked  
4 you this already. After that tap and you back up  
5 and the officers takes Jordan away, have you seen  
6 or talked to Jason Jordan at any point after that?

7 A. No.

8 Q. Seen or talked to Alyssa Jordan at any  
9 point after that?

10 A. No.

11 Q. Seen or talked to this guy Chris  
12 Soukup?

13 A. No.

14 Q. At any point, did you come in contact  
15 with that guy Chris?

16 A. No.

17 Q. Did Amanda communicate with you at all  
18 during this time frame that we're talking about?  
19 When this altercation starts, when you detain  
20 Jordan, at any point does Amanda communicate with  
21 you?

22 A. No. I remember she was talking to a  
23 guy, I guess, by the wall. I guess that's -- I  
24 don't really know their names. The one guy she  
25 was talking to -- I had got down. And she had

1 that guy talking to him. And he was saying that  
2 he was their leader. Whoever this guy was.  
3 Saying that he was in charge and he knows those  
4 guys and blah, blah, blah, and that was it.

5 Q. Okay. But you didn't ever talk to --  
6 the guy that she was talking to, did you ever have  
7 any interaction with him whatsoever?

8 A. No.

9 MR. STEWART:

10 Other than what he's already testified  
11 to about pulling him out of the initial fight when  
12 he said -- are you talking about -- you're  
13 mischaracterizing the testimony. He has already  
14 previously testified that he pulled the initial  
15 guy out of the fight.

16 MR. BELLINDER:

17 Q. Do you remember exactly which guy it  
18 was that you pulled out initially?

19 A. One guy that was fighting had a black  
20 shirt. That was the guy that was saying, You  
21 don't hit a woman. You don't hit a woman. You  
22 don't hit a woman. The guy in the white shirt was  
23 there and then backed him off while I get the  
24 Jordan guy. And that was after he, the Jordan  
25 guy, had hit John Brown in the eye and knocked off

1 his glasses. They brought a wheelchair up to get  
2 him out, and he turned around and hit John Brown  
3 in the eye and knocked his glasses off.

4 So then I moved the guy in the white  
5 shirt, made him back up. And then I get the  
6 Jordan, I guess, Jordan guy. Then the guy in the  
7 black shirt comes up saying, You don't hit a  
8 woman. We don't do that in the military. He kept  
9 saying that. Supposedly Jordan got punched by  
10 that guy in the face. He said, You don't hit a  
11 women. He hit him in the face. So he tried to  
12 fight the Jordan guy, I guess. Is Jordan the guy  
13 that we got? Is that Jordan? I don't know who is  
14 who.

15 Q. They called him something else that  
16 evening. But from what we can reference on this,  
17 the guy that --

18 A. The guy I had pinned, is that Jordan?

19 Q. That's Jordan. The guy that the police  
20 removed, that's Jordan.

21 A. When he punched the guy, the guy  
22 says --

23 Q. You're talking about the guy with the  
24 black shirt?

25 A. Black shirt, yes, sir. You don't hit a

1 woman. We don't do that in the military. You  
2 don't hit a woman. And as I pull him off --

3 Q. That's the black shirt guy?

4 A. Right. And then that's when I had  
5 Jordan down the first time. And I had his arm.  
6 I'm pushing this guy back. Jordan's wife comes  
7 up, and she's saying. What are you doing? And he  
8 reach around my arm, and he hits her three times  
9 in the face. Then I pull him into the entrance  
10 out there, and I hold him down. And that's when  
11 he is saying, If had a bayonet, I'd blah, blah,  
12 blah your head. I'm trying to -- you know, Why  
13 would you do that? Calm down. And she comes and  
14 talks to him again. He calls her an F'ing B,  
15 F'ing B, blah, blah. And some guy reaches -- a  
16 guy in a white shirt, actually, reaches up and  
17 grabs -- but it's not that guy. It's a different  
18 guy.

19 Q. Different white shirt?

20 A. Different white shirt. Puts his arm  
21 around her and pulls her back. That guy says,  
22 Ma'am, you need to back up. You need to back up.  
23 And this guy grabs her -- I don't know -- like I  
24 said, I don't know who's all in the party. I  
25 don't know if he knows her, but he grabs her and

1 pulls her back. I'm holding him down. And you  
2 can see when she comes up, I'm holding him down.  
3 And I'm trying to calm him, told him to Relax.  
4 Relax, Man. And when she is talking to him,  
5 and he calls her the F'ing B, you will see me  
6 do -- I'm like this. That's when he is trying to  
7 hit her again. I'm not letting his arm go. And  
8 then the guy pulls her back. And then soon after  
9 that, that's when Biloxi police came up and the  
10 guy taps me on the shoulder. I let him grab him,  
11 and I backed up. That's it.

12 Q. At any point, did you contact the guy  
13 in the first white shirt?

14 A. I pulled him out of the crowd, yes.  
15 Pulled him out of the crowd.

16 Q. You pulled him out of the crowd?  
17 A. After Jordan hit John Brown in the eye,  
18 he tried to -- he was try -- they're friends, but  
19 they were trying to fight the Jordan guy. And  
20 then so I get him back. But it was just simple  
21 back up.

22 Q. Did you ever see him swing?

23 A. He grabbed at him. He grabbed at him  
24 and just tried to grab him. And then when I  
25 grabbed him back, you know, everyone gets mad when

1 you grab them. So I backed him up, and then I get  
2 this Jordan guy down. And he punches -- the guy  
3 in the black shirt says, You don't hit a woman.  
4 He hit him. Then I put Jordan down. Well, they  
5 fall on the ground because they're fighting. I  
6 pull him off, and that's when, you know, he hits  
7 his wife, and I pull him off.

8 Q. Okay. Have you ever had any police  
9 training?

10 A. I have trained police. I have trained  
11 army, special forces. What it was, I was in  
12 martial arts a long time, and so they -- I went to  
13 Russia a lot and trained with the special  
14 discipline forces, and I've trained guys in  
15 hand-to-hand.

16 Q. Any other training that you can think  
17 of?

18 A. No.

19 Q. What's your -- what's your rank in  
20 martial arts? Do you have a belt?

21 A. Grand master.

22 Q. Do you remember hearing any of these  
23 other folks -- you've described the conversations  
24 pretty detailed. Did you ever hear the first  
25 white shirt guy say anything?

1 A. No.

2 Q. Did you ever hear -- aside from briefly  
3 what you told us the second white shirt guy, do  
4 you ever remember him saying anything?

5 A. No. The guy that grabbed the girl?

6 Q. Right.

7 A. No. I wasn't sure who he was, you  
8 know. He just grabbed her. I don't know who all  
9 was in that party. Whether he was a friend or  
10 what.

11 Q. Do you ever remember anybody -- did you  
12 ever remember hearing someone tell the guy on the  
13 ground the ground he was under arrest?

14 A. No. The officers did tell him to stop  
15 fighting, stop fighting, stop fighting. And he  
16 kept yelling the bayonet thing to them.

17 Q. You never told him that he was under  
18 arrest when you were detaining him?

19 A. No. We can't arrest nobody, so we  
20 never say that.

21 Q. This all took place about 2:30 in the  
22 morning?

23 A. Uh-huh.

24 Q. Yes?

25 A. Yes, I'm sorry.

1 Q. As far as any injuries that may or may  
2 not have occurred or come about as a result of  
3 this, you haven't been told by anybody -- of  
4 course aside from the lawyer for the casino -- but  
5 have you been told by anybody as far as injury  
6 that Jason Jordan, Alyssa Jordan, or Chris Soukup  
7 may have --

8 A. Only from the lawyers.

9 Q. Nobody else has told you?

10 A. Nobody else.

11 Q. Have you told us all of your -- all of  
12 the training or instruction that the Hard Rock  
13 folks gave you when you came to work and came to  
14 be a part of the security team there at the Hard  
15 Rock?

16 A. Uh-huh.

17 Q. That was a yes?

18 A. Yes.

19 Q. Did you ever hear somebody talk about  
20 an ambulance or call an ambulance; do you  
21 remember?

22 A. No, if they did, that was done  
23 downstairs. I stayed in the club. My post was  
24 the club. So when they get them down the stairs,  
25 I don't know what happened down there.

1 MR. BELLINDER:

2               Okay. I think that's it. That's all I  
3 have got for you.

4 MS. STEEL:

5               I have got a few questions.

6               EXAMINATION

7 BY MS. STEEL:

8 Q.       You testified that someone punched that  
9 guy three times in the face?

10 A.       No. Punched the wife.

11 Q.       He punched the wife.

12 A.       Yeah. He hit the wife three times in  
13 the face?

14 Q.       Was that Jason Jordan?

15 A.       Yes, ma'am.

16 Q.       Okay. He hit the wife in the face?

17 A.       He hit the wife, yes, ma'am.

18 Q.       Did you see any punches thrown?

19 A.       Those I did.

20 Q.       Other than those?

21 A.       No. Well, I'm sorry. I saw him hit  
22 John Brown. He knocked John Brown's glasses -- he  
23 hit John Brown in the eye.

24 Q.       Was that Jason Jordan?

25 A.       Jason Jordan, yes.

1           Q.     The altercation between Mr. Jordan and  
2 his wife and the other people who were involved  
3 took place inside the club?

4           A.     Yes, ma'am. Inside the club, yes,  
5 ma'am.

6           Q.     And you said that you pulled him to the  
7 entrance and pinned him down?

8           A.     Yes, ma'am.

9           Q.     That -- where -- what are you  
10 calling -- is that the foyer area?

11          A.     In the foyer area, yes, ma'am. When  
12 you come up the stairs, yes, ma'am.

13          Q.     All right. And that is different  
14 from -- that is apart from the club?

15          A.     Yes, ma'am.

16          Q.     You saw the Biloxi police arrive,  
17 correct?

18          A.     Yes, ma'am.

19          Q.     And when the Biloxi police arrived and  
20 came inside, was Jason Jordan on the floor in the  
21 foyer?

22          A.     I had him on the floor in the foyer.

23          Q.     Okay. When the police approached Jason  
24 Jordan, was Jason Jordan moving around?

25          A.     Yes, ma'am.

1 Q. Was he talking?

2 A. Yes, ma'am.

3 Q. Did you see the police attempt to  
4 handcuff Jason Jordan?

5 A. Well, they may have, but he was  
6 fighting so much, you know. I don't know. I was  
7 getting the crowd back. So I don't know if they  
8 tried to turn him over or whatever, but I know he  
9 was fighting and he yelled out the whole bayonet  
10 thing, so...

11 Q. All right. At any point after the  
12 police arrived, when the police office arrived and  
13 after, did you see Jason Jordan lose  
14 consciousness?

15 MR. BELLINDER:

16 Object to the form.

17 A. No, ma'am.

18 MS. STEEL:

19 Q. At any time after the police came, did  
20 you see Jason Jordan stop talking and stop moving  
21 around?

22 A. No, ma'am. You know, he just yelling  
23 that, you know, over and over and over what he  
24 would do. And I knew that was -- you know, I was  
25 like, Man, that's going to get you in more

1 trouble. Saying what he would -- he kept saying,  
2 I'm going to kill everybody. He kept saying that  
3 over and over about if I had a bayonet, I'd cut  
4 your head off and all that. He said it to me. He  
5 said it to them, too, over and over and over.

6 Q. When the police -- scratch that. After  
7 the police got Mr. Jordan handcuffed, did you stay  
8 around in that area?

9 A. I stayed in the club. I stayed in the  
10 club.

11 Q. Did you see the police get Mr. Jordan  
12 up off the floor?

13 A. They picked him up and took him  
14 downstairs.

15 Q. Did the police give Mr. Jordan an  
16 opportunity to stand up?

17 MR. BELLINDER:

18 Object to form.

19 A. Yes.

20 MS. STEEL:

21 Q. When -- just so it don't throw you off,  
22 we -- as attorneys, we object to the form of the  
23 question. And it's not directed to you. It's  
24 more directed at the other attorney.

25 A. Okay.

1 Q. Okay. So you did see the police give  
2 Mr. Jordan an opportunity to stand up?

3 A. Uh-huh.

4 MR. BELLINDER:

5 Object to form.

6 MS. STEEL:

7 Q. Did you say yes?

8 A. Yes, ma'am.

9 Q. Could you give me an estimation of how  
10 many people were in the club when the altercation  
11 occurred?

12 A. It's hard to say, ma'am. It was a  
13 crowd, but I don't know.

14 Q. Would you say a hundred or more?

15 A. Yes.

16 Q. And was the club shut down?

17 A. No, ma'am. The club closes at 3:00.

18 It was around 2:30 when this happened.

19 Q. Okay. So the club wasn't shut down?

20 A. Right.

21 MR. STEWART:

22 Do you mean after this or are you  
23 talking about at the time of this?

24 MS. STEEL:

25 Q. At the time of this or immediately

1 after --

2 A. Oh, immediately after --

3 Q. -- the time of the confrontation?

4 A. -- immediately after, it was shut down.

5 Q. Okay. So after -- was it before the  
6 police arrived or after?

7 A. No. When -- when I got them out, they  
8 started yelling last call and closing up then.

9 They was closing and some people were going in  
10 closing tabs or whatever, but they was closing  
11 down.

12 Q. So that's what was going on when the  
13 police arrived?

14 A. Yes, ma'am.

15 Q. Patrons were leaving?

16 A. Right.

17 Q. Did you see the Biloxi police strike  
18 Mr. Jordan?

19 A. No, ma'am.

20 Q. Did you see the taser being used?

21 A. I did not. I did not see that, no,  
22 ma'am. I know someone said that, but I didn't see  
23 that. I was getting the crowd back.

24 MS. STEEL:

25 That's all I have.

1 MR. CLARK:

2 I don't have anything.

3 EXAMINATION

4 BY MR. BELLINDER:

5 Q. Real quick just to follow up with you.

6 We mentioned -- she asked you about the punches  
7 that were thrown. You say you saw essentially  
8 four punches that Jordan punched his wife three  
9 times and punched Mr. Brown once?

10 A. Yes.

11 Q. You say you've seen the video. And so  
12 the time frame when this would have allegedly  
13 occurred is at a time where Jordan cannot be seen  
14 on the video; is that right?

15 A. No. You can see him punch his wife.

16 Q. Okay. You say you can see him?

17 A. You can see him and his wife, yes.

18 Q. Do you remember specifically where it  
19 is on the video where you see him?

20 A. He was on the floor, and I was  
21 breaking -- fighting the guy with the black shirt,  
22 and you see him hit his wife three times.

23 Q. Is this the video you think you saw it  
24 on the one with the four?

25 A. Yes.

1 Q. I'm trying to skip ahead to save some  
2 time. This is 2:34. If you will, just let us  
3 know when you see it. Make that a little bigger.

4 MR. CLARK:

5 What's the time right now? Where are  
6 we at?

7 MR. BELLINDER:

8 This is 2:34:36 seconds.

9 MR. CLARK:

10 All right.

11 MR. BELLINDER:

12 Q. This is Mr. Brown, is it not, that you  
13 just walked out the door on the top, right?

14 A. Yeah. That was -- it's when I had him  
15 on the floor right at the beginning of the club.  
16 Yeah. That's where he hit her, and her friend was  
17 consoling her, taking her out.

18 Q. So we need to go back some.

19 A. No, no, no. It's way after that.  
20 You'll see the girl --

21 Q. Okay. You're saying he hit --

22 A. You'll see the friend grabs her.  
23 Supposedly the guy was saying he had punched her,  
24 and that's why they were fighting because he said,  
25 You don't hit a woman. You don't hit a woman.

1 Q. But you didn't see that in --

2 A. No. I was outside.

3 Q. We don't have that on this?

4 A. That's what the guy was telling me.

5 And she was holding her face, and her friend was  
6 taking her out. Then one of them -- the guy comes  
7 to me and says, Hey, Man, my friend, him and his  
8 wife is fighting. I want to get them out. I  
9 said, Okay, sure. Go ahead and get them out. And  
10 then --

11 Q. Do you see yourself on here anywhere?

12 A. No, not yet.

13 MR. STEWART:

14 Just for the record, there is four  
15 quads going at the same time.

16 MR. BELLINDER:

17 Q. We are mainly looking at the bottom  
18 left.

19 A. The front door was there.

20 Q. Spins and then comes back to the --

21 A. It would be down here.

22 Q. Tell us who is -- who is what?

23 A. I'll tell. Amanda.

24 Q. That's Amanda right there. We're  
25 looking at 2:36:27 seconds.

1 A. Uh-huh.

2 Q. Amanda talking to -- I think we have  
3 referred to him as the first white shirt guy?

4 A. Right.

5 Q. And then up here in the top right, now  
6 we've got another little scuffle going on?

7 A. Okay. Yes.

8 Q. Let's maybe back that up a little bit  
9 and look.

10 A. I got -- watch and you will see. Okay.  
11 That's when he is fighting the guy and saying, You  
12 don't hit a woman. You don't hit a woman. That's  
13 me right there. And this is the other guy. You  
14 see me hold his arms. His wife comes up, and you  
15 watch he swings one, two, and hit her the third  
16 time and knocked her back.

17 Q. This is the point you're talking about  
18 that --

19 A. That's when I take him out. And he  
20 swings around me to hit her. When I had his  
21 hand, he swings around my arm to hit her three  
22 times.

23 MR. BELLINDER:

24 Okay. I think that's all I have got.

25 MR. STEWART:

1 Anybody else? We're done.

2 (Deposition concluded at 1:41 p.m.)

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1 CERTIFICATE OF COURT REPORTER

2 I, Janna White, CSR #1312, do hereby  
3 certify that the foregoing pages contain a true  
4 and correct transcript of the testimony of the  
5 witness as taken by me at the time and place  
6 heretofore stated and later reduced to typewritten  
7 form by computer-aided transcription under the  
8 authority vested in me by the State of Mississippi  
9 to testify to the truth and nothing but the truth  
10 in this cause and was thereupon carefully examined  
11 upon this oath.

12 I further certify that I am neither  
13 attorney or counsel for nor related to or employed  
14 by any of the parties to the action in which this  
15 deposition is taken and further that I am not a  
16 relative or employee of any attorney or counsel  
17 employed by the parties hereto or financially  
18 interested in the action.

19 Witness my signature, this the \_\_\_\_\_ day  
20 of \_\_\_\_\_, 2014.

21  
22  
23 \_\_\_\_\_  
24  
25 Janna White, CSR #1312